

**From:** [James McKenna](#)  
**To:** [Chip Humphrey/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#)  
**Cc:** [Jennifer Woronets](#); [Bob Wyatt](#); [Keith Pine](#); [Gene Revelas](#)  
**Subject:** LWG Response to EPA's Data Lock-Down Comments  
**Date:** 11/01/2010 04:56 PM

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Chip and Eric:

EPA provided two comments on the draft RI that requested new data be presented in the RI and FS that was collected after our agreed-upon data lockdown date (i.e., June 2008). The two comments were S23 and S218. Based on recent conversations with you and the Agency team, the LWG proposes the following as a response to these comments:

1. LWG and EPA agree that the data set to be used for the RI and risk assessments is to be unchanged (i.e., data lock-down of June 2008);
2. LWG will update the project data base with the finite list of recent studies of bedded sediment that EPA cited in their comments to the draft RI (i.e., the downtown reach sampling conducted by the City, ARCO-BP post-source control in-water data; and new data from RM 11 east) as well as some others identified by the RI/FS team (e.g., the Post Office Bar and U.S. Mooring data sets);
3. LWG will not conduct a "survey" to determine the full universe of any and all new data sets;
4. The updated electronic project data base will be provided to EPA as soon as practicable, enabling the Agency to conduct their own queries and searches;
5. A bibliography of these new data sets will be provided in an appendix of the revised RI, along with hard copies of reports generated by the party(s) who conducted the studies (including their tables of the data and related maps);
6. Text will be added to the appropriate paragraphs of Sections 5 and 10 of the revised RI that states new data at RM 11 east provides a more accurate depiction of the nature and extent of contamination (namely, PCBs), including the vertical extent;
7. Text will be added to the appropriate paragraphs of Section 5 (e.g., Section 5.6.2.1) that refers to post-data lockdown data from the downtown reach that was collected by the City.
8. Tables 5.6-3 through 5.6-6 and Table 5.6-13 will remain the same because they reflect the agreed-upon data lockdown data set (i.e., June 2008).
9. New text will be added to Section 10, CSM, that refers to the post-data lockdown data discussed in Section 5.6 (i.e., downtown sediment data collected by the City). The new text in Section 10 will note that the additional upstream data provides support for the currently established upstream study boundary of RM 11.8.

Please let us know if this proposal is acceptable to the Agency and we will include it in our comprehensive table of resolved issues.

Thanks,

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